

Exhibit 3

KIRKLAND & ELLIS LLP

AND AFFILIATED PARTNERSHIPS

Alexia Renee Brancato
To Call Writer Directly:
+1 212 909 3344
alexia.brancato@kirkland.com

601 Lexington Avenue
New York, NY 10022
United States

+1 212 446 4800

www.kirkland.com

Facsimile:
+1 212 446 4900

February 2, 2024

VIA EMAIL ONLY

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Ruben Honik
Honik Law
1021 Kitchens Lane
Philadelphia, PA, 19119
ruben@honiklaw.com

Daniel Nigh
NIGH GOLDENBERG RASO &
VAUGHN, PLLC
14 Ridge Square NW
Washington, D.C. 20016
Phone: (850) 600-8090
dnigh@nighgoldenberg.com

Adam Slater
Mazie Slater Katz & Freeman, LLC
103 Eisenhower Parkway
Suite 207
Roseland, NJ 07068
aslater@mazieslater.com

Conlee Whiteley
Kanner & Whiteley, LLC
701 Camp Street
New Orleans, LA 70130
c.whiteley@kanner-law.com

Re: ***In re: Valsartan, Losartan, and Irbesartan Products Liability Litigation.,***
U.S. District Court for the District of New Jersey,
Case No. 1:19-md-02875-RBK-JS

Dear Counsel:

Enclosed please find Defendants Torrent Pharmaceuticals Ltd. and Torrent Pharma, Inc.'s (collectively, "Torrent") proposed designations for the following witnesses for use in the March 2024 TPP trial:

1. Dawn Chitty
2. Sushil Jaiswal
3. Reddy Neravetla
4. Paras Sheth
5. Margaret Finn

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Conlee Whiteley
David J. Stanoch
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Torrent's proposed designations are set forth in the accompanying excel spreadsheet. These designations may be used by Torrent at the trial of this matter and, if used, will be shown by videotape or read into the record. Please advise of any objections and counter-designations to be served on a rolling basis.

Torrent reserves all rights to supplement, amend, edit, modify, or withdraw these or other proposed designations at any time before or during trial, including to serve additional affirmative designations on a rolling basis. Torrent further reserves all rights to object to any counter-designations and affirmative designations identified by Plaintiffs. Torrent reserves the right to amend or supplement these or other designations in the event further issues arise prior to trial or if additional evidence or testimony is adduced during trial or pre-trial proceedings, and specifically may serve further affirmative designations for these and other witnesses in response to subsequent meet and confers, additional designations served by Plaintiffs or codefendants, the Court's rulings on motions for summary judgment and motions in limine, stipulations reached by the parties, witness availability issues, or other reasons. In designating portions of the depositions above, Torrent does not waive, and expressly reserves, any and all objections to the admissibility of the designated testimony at the trial of this matter.

Sincerely,

/s/ Alexia R. Brancato

Alexia R. Brancato

cc: Lori G. Cohen,, Esq. (via email)
Jessica Davidson, Esq.(via email)
Victoria Davis Lockard, Esq. (via email)